



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

86 Chambers Street  
New York, New York 10007

June 25, 2024

**BY ECF**

The Honorable John G. Koeltl  
United States District Judge  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

**APPLICATION GRANTED  
SO ORDERED**

  
John G. Koeltl, U.S.D.J.

6/26/24

**Re: *Ali Majed Soudi Alfar v. Quarantillo, et al., 22 Civ. 10260 (JGK)***

Dear Judge Koeltl:

This Office represents the government in the above-referenced action brought pursuant to 8 U.S.C. § 1421(c), in which plaintiff challenges the denial by U.S. Citizenship and Immigration Services (“USCIS”) of his Application for Naturalization (Form N-400). I write respectfully to request a 22-day extension of the government’s deadline to respond to plaintiff’s amended complaint (from June 27, 2024, to July 19, 2024). The government respectfully requests this extension because it intends to file a motion to dismiss plaintiff’s amended complaint, and undersigned counsel needs additional time to confer with USCIS and to finalize the government’s papers in support of its motion to dismiss. Furthermore, undersigned counsel will be out of the country on previously scheduled leave from June 30 to July 13, 2024.

This is the government’s second request for an extension of its deadline to respond to the amended complaint, and plaintiff takes no position on this request. If the Court grants the government’s request, plaintiff would request a deadline of September 3, 2024, to respond to the government’s anticipated motion to dismiss. The government would consent to plaintiff’s request, and thus proposes the following briefing schedule:

- The government’s motion to dismiss due by July 19, 2024;
- Plaintiff’s response due by September 3, 2024; and
- The government’s reply due by September 24, 2024.

I thank the Court for its consideration of this request.

Honorable John G. Koeltl

Page 2

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

By: s/ Courtney E. Moran  
COURTNEY E. MORAN  
Special Assistant United States Attorney  
86 Chambers Street, 3rd Floor  
New York, New York 10007  
Telephone: (917) 836-0126  
E-mail: courtney.moran@usdoj.gov  
*Attorney for Defendants*

cc: Counsel for Plaintiff (by ECF)